

# Exhibit B

**Cooper Strickland**  
Attorney at Law  
Post Office Box 92  
Lynn, North Carolina 28750

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[Via Electronic Transmission: joshua.kolsky@usdoj.gov, rachael.westmoreland@usdoj.gov, madeline.m.mcmahon@usdoj.gov, danielle.young2@usdoj.gov]

Joshua M. Kolsky  
Rachel Westmoreland  
Madeline McMahon  
Danielle Wolfson Young  
Trial Attorneys  
United States Department of Justice  
Civil Division, Federal Programs Branch  
1100 L Street NW  
Washington, DC 20005

RE: Strickland v. United States (1:20-cv-00066-WGY)

Dear Counsel:

Plaintiff hereby submits this privilege notice to Defendants pursuant to Fed. R. Civ. P. 26(b)(5), Fed. R. Evid. 502(a)–(b), (d), and the Parties’ Stipulated Clawback Agreement (ECF No. 184). During her deposition on April 25, 2023, privileged information was inadvertently disclosed in response to counsel’s questions about [REDACTED] Tr. 134; Tr. 166–69. The information concerns [REDACTED]

Moreover, this line of questioning has had the effect of [REDACTED]

[REDACTED] For this reason, Plaintiff also asserts [REDACTED].

Plaintiff asserts privilege over this entire line of questioning. Additionally, Plaintiff asks that Defendants follow the procedures in the above cited authorities by striking the testimony, or, alternatively, by consenting that Plaintiff contact the court reporter to ensure that the testimony is stricken; destroying all documents with the testimony and any copies; and certifying to Plaintiff that the testimony has been stricken and that the document and any copies have been destroyed.

Respectfully,

/s/ Cooper Strickland  
Cooper Strickland